

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

SPERO HARITATOS, an Individual,

Plaintiff,

v.

MANDATORY DISCLOSURE

05-CV- 930 (DNH/GJD)

HASBRO, INC., a Rhode Island corporation and
TOYS "R" US-NY LLC, a New York limited
liability corporation,

Defendants.

SIRS:

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 26(a), defendant, Toys "R"

US-NY LLC, states as follows:

1. Individuals known or believed to have information with respect to claims
and defenses:

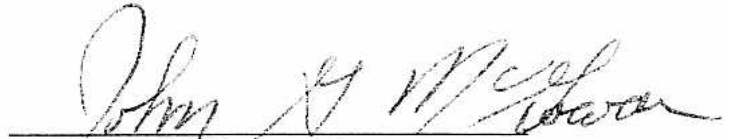
(a) Michael Tabakin, employed by Toys "R" Us.

(b) Greg Staley, Warren Kornblum, Joel Anderson, Elliot Wahls, each of
whom was formerly employed by Toys "R" Us.

2. Accompanying this initial disclosure are documents from Toys "R" Us files. In addition, be advised that there are written communications which are sent by or to Toys "R" Us's attorneys, of which privilege is claimed.

3. No expert witness has been retained by Toys "R" Us as of this date.

Dated: December 14, 2005



John G. McGowan, Esq.
(Bar Roll # 501388)
Attorneys for Toys "R" Us
Bond, Schoeneck & King, PLLC
One Lincoln Center
Syracuse, New York 13202
Telephone: (315) 218-8000
Direct: (315) 218-8121
Fax: (315) 218-8100

TO: Robert E. Purcell, Esq.
Wall, Marjama, Bilinski & Burr
Attorneys for Plaintiff
101 South Salina Street
Suite 400
Syracuse, NY 13202
Telephone: (315) 425-9000
Fax: (315) 425-9114